

REMARKS

I. Introduction

In response to the Office Action dated February 16, 2005, Applicants have amended claim 1 to substantially incorporate the claimed subject matter recited by original claim 4. Also, claim 2 has been amended to include the term “unit,” whereas claim 7 has been amended to address the pending rejection under 35 U.S.C. § 112, second paragraph. Support for these amendments can be found, for example, in Fig. 17 and its corresponding section of the specification. No new matter has been added.

For the reasons set forth below, Applicants respectfully submit that all pending claims are patentable over the cited prior art references.

II. Claim Objection

The Examiner has objected to claim 1 because it is unclear what is converted by the data conversion and synthesis unit. However, as discussed at page 7, line 20 to page 8, line 5 of the specification, the data conversion and synthesis unit includes 1) the operation manual data conversion unit 110 and the operation manual data synthesis unit 112, 2) the specification data conversion unit 113 and the specification data synthesis unit 115 and 3) the design data conversion unit 117 and the design data synthesis unit 119. Specifically, the operation manual data conversion unit 110 and the operation manual data synthesis unit 112 convert and synthesize the module-based operation manual data extracted from the registered-IP database 120 *into the operation manual* 10 based on the individual detailed specifics 170b. Also, the specification data conversion unit 113 and the specification data synthesis unit 115 convert and synthesize the module-based specification data extracted from the registered-IP database 120 *into the product*

specification 11 based on the individual detailed specifics 170b. Further, the design data conversion unit 117 and the design data synthesis unit 119 convert and synthesize the module-based design data extracted from the registered-IP database 120 *into the LSI design data* 12 based on the individual detailed specifics 170b. The claim elements of claim 6 also make clear of the foregoing conversion performed by the data conversion and synthesis unit, in which the data conversion unit is capable of converting the extracted document data *into a data format with tags*, and the data synthesis unit is capable of synthesizing *the result of the conversion* performed by the data conversion unit.

For all of the foregoing reasons, as claim 1 would be readily understandable by one of skill in the art, it is respectfully requested that the pending objection be withdrawn.

III. The Rejection Of Claim 7 Under 35 U.S.C. § 112, Second Paragraph

Claim 7 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite, because the claim limitation “*the* registered data in the database” lacks antecedent basis. As claim 7 has been amended to recite “*a* registered data in the database,” it is respectfully requested that the pending rejection to claim 7 be withdrawn in view of the foregoing amendment.

IV. The Rejection Of Claims 1-5 and 7-11 Under 35 U.S.C. § 102

Claims 1-5 and 7-11 are rejected under 35 U.S.C. § 102(b) as being anticipated by USP No. 6,304,790 to Nakamura. Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1 recites in-part a detailed-specific preparation temporary unit for preparing detailed-specific management information ... and individual detailed specifics ... *based on the information inputted in the input interface unit.*

In accordance with one exemplary embodiment of the present invention, the detailed-specific preparation temporary unit 170 holds the generic data 170c and stores the data therein for use in preparing the detailed-specific management information 170a and the individual detailed specifics 170b based on the information inputted in the input interface unit 102. Specifically, the detailed-specific management information 170a indicates the module configuration of the LSI to be developed, while the individual detailed specifics 170b are specifics for each module comprising the target LSI (see, e.g., page 7, lines 7-12 of the specification). As a result of the foregoing structure, the present invention advantageously provides an LSI development support system which generates design data and documents that are consistent with each other (see, e.g., page 1, line 25 to page 2, line 2 of the specification).

In the pending rejection, the Examiner cited col. 5, lines 13-16, col. 9, lines 35-45 and col. 14, lines 26-40 of Nakamura as allegedly disclosing the aforementioned claimed feature. However, Applicants respectfully disagree with the Examiner's interpretation, because, in Nakamura, it is only after the estimation parameter information has been prepared as the template will the user be prompted for input, at which point the estimation parameter information is then given to the symbol and the line, which are entered by the block diagram input/editing unit 2. Nakamura does not disclose or suggest preparing the estimation parameter information based on the information inputted in the user interface unit 4, and in direct contrast discloses that the user inputs a parameter *in response* to the parameter input screen (i.e., parameter template) already saved in the parameter template holding unit 5 (see, col. 14, lines 19-23). This is

supported by the express principle of operation given by Nakamura; namely, the estimation parameter information is prepared as the template in the parameter template holding unit 5 so that a user is prompted for input (see, col. 5, lines 51-59). In other words, Nakamura discloses inputting the users' parameters based on the estimation parameter information prepared as a template, whereas the present invention as recited by claim 1 embodies preparing the detailed specific management information and the individual detailed specifics based on the information inputted in the input interface unit. Most importantly, it is noted that the parameter template holding unit 5 of Nakamura is merely used to store a template of an estimation/evaluation parameter so that the parameter setting unit 22 may add or change a desired parameter to or from the template held therein (see, col. 4, lines 40-44 and col. 14, lines 26-30). Similarly, the block information obtained from the block diagram input/editing unit 2 is stored in the library form into the block information storage unit 6 (see, col. 9, lines 33-44 and col. 14, lines 33-36). That is, the parameter template holding unit 5 and the block information storage unit 6 of Nakamura are merely utilized as storage for storing information modified by the block diagram input/editing unit 2. In other words, the parameter template holding unit 5 and the block information storage unit 6 of Nakamura do *not* prepare any information, let alone doing so based on the information given in the user interface unit 4.

Furthermore, claim 1 recites a data conversion and synthesis unit for converting and synthesizing the extracted design data and document data based on the individual detailed specifics. However, as discussed above, the parameter template holding unit 5 of Nakamura does not prepare any information, let alone suggest converting and synthesizing the alleged design data and document data based on such information. In this regard, it is noted that the pending Office Action references various portions of Nakamura as allegedly disclosing the claim

features recited by claims 1-5 and 7-11, but does not identify precisely which elements are being read on the respective claimed features. As such, it is difficult for the Applicants to address the issues raised by the Examiner and to provide a proper rebuttal. If the pending rejection is maintained, it is respectfully requested that the next Office Action identify which specific element of Nakamura reads on or corresponds to *each and every* element recited by the pending claims so as to afford the Applicants an opportunity to further address the Examiner's arguments and/or specific elements identified as reading on the pending claims.

Accordingly, as anticipation under 35 U.S.C. § 102 requires that each element of the claim in issue be found, either expressly described or under principles of inherency, in a single prior art reference, *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983), and at a minimum, Nakamura fails to disclose or suggest the foregoing claim elements, it is clear that Nakamura does not anticipate claim 1 or any of the claims dependent thereon.

As a final note, claim 1, as amended, recites that the document data includes LSI user's manual data. It is admitted that Nakamura does not disclose or suggest an operation manual data, and the "help" function illustrated in Fig. 3 of Bloom (USP No. 6,810,508) is relied upon to cure this defect of Nakamura. However, it is respectfully submitted that the "help" function of Bloom is neither a document data that serves as LSI design assets nor a document data that is mutually related to the alleged design data of Nakamura on a module-by-module basis, as recited by claim 1. This is evidenced by the fact that the "help" function of Bloom merely serves as the conventional "F1 Help" (note "press F1") in which it opens a help screen on a topic associated with the currently selected item by the user related to windows, dialog boxes, message boxes, menus, and toolbar buttons. In other words, the "help" function of Bloom is completely unrelated to any LSI data. If the argument with respect to Bloom is maintained in the next

Office Action, Applicants respectfully request detailed explanation with regard to how the “help” function of Bloom is a document data that is mutually-related to the alleged design data, or a document data that can be extracted by the alleged database selection unit or converted and synthesized by the alleged data conversion and synthesis unit.

Thus, as each and every limitation must be either disclosed or suggested by the cited prior art in order to establish a *prima facie* case of obviousness (see, **M.P.E.P. § 2143.03**), and Nakamura and Bloom, taken alone or in combination, fail to do so, it is respectfully submitted that claim 1 is patentable over the cited prior art.

V. All Dependent Claims Are Allowable Because The Independent Claims From Which They Depend Are Allowable

Under Federal Circuit guidelines, a dependent claim is nonobvious if the independent claim upon which it depends is allowable because all the limitations of the independent claim are contained in the dependent claims, *Hartness International Inc. v. Simplimatic Engineering Co.*, 819 F.2d at 1100, 1108 (Fed. Cir. 1987). Accordingly, as independent claim 1 is patentable for the reasons set forth above, it is respectfully submitted that all claims dependent thereon are also in condition for allowance.

VI. Conclusion

Accordingly, it is urged that the application is in condition for allowance, an indication of which is respectfully solicited.

Application No.: 10/633,038

If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP


Michael E. Fogarty
Registration No. 36,139

600 13th Street, N.W.
Washington, DC 20005-3096
Phone: 202.756.8000 MEF/AHC/jdj/dlb
Facsimile: 202.756.8087
Date: May 16, 2005

**Please recognize our Customer No. 20277
as our correspondence address.**